

Assan Aluminyum (26648), Environmental and Social Action Plan – August 5, 2008

Item	Action	Completion Indicator	Timetable
	PS1: Social and Environmental Assessment and Management Systems		
1	Assan Aluminyum will develop and maintain an environmental permit register for all its companies.	Assan Aluminyum has developed the environmental permit register and submitted it to IFC, together with the Annual Monitoring Report f(AMR) or the project.	First AMR submittal in the first quarter of 2009.
2	Assan Aluminyum will develop an ISO 14001 and OHSAS 18001 management system for Dilovasi Plant.	Assan Aluminyum has obtained ISO 14001 and OHSAS 18001 certifications.	December 2009.
3	Assan Aluminyum and Assan Demir will review their organization to create a corporate HSE management function to ensure consistent HSE approach throughout the plants in Tuzla, Dilovasi and Kartal.	Assan Aluminyum and Assan Demir have created a corporate HSE function.	December 2009.
	PS2: Labor and Working Conditions		
4	Assan Aluminyum will ensure that medical staff and technical resources are consistently allocated in Tuzla, Dilovasi and Kartal.	Assan Aluminyum has reviewed organization of medical emergency / infirmery services at all plants and provided additional resources, as needed.	March 2009
5	Assan Aluminyum will hire external qualified consultants, acceptable to IFC, to conduct occupational safety and comprehensive fire and explosion safety assessments at Dilovasi and Kartal plants and develop an action plan, as needed. Assan will review the operations in Tuzla according to the findings of these assessments and measures will be taken as necessary.	Assan Aluminyum has submitted the consultant's report and the relevant corrective action plan to IFC and IFC has reviewed and approved it.	a) Assessment workplan: COD. b) Submittal of assessments and corrective action plan within three months from workplan approval. c) Implementation of corrective actions as per agreed time schedule.
6	Assan Aluminyum will develop and implement work permits and lock-out tag-out procedures to cover semi-routine and non-routine works on manufacturing equipment, chemical and energy lines and other operations presenting high risk such as confined space entry, work at height, hot work etc., involving both staff and contractors.	Assan Aluminyum has developed the procedures. IFC has reviewed and accepted them.	As soon as possible, but not later than March 2009.

Assan Aluminyum (26648), Environmental and Social Action Plan – August 5, 2008

Item	Action	Completion Indicator	Timetable
7	Assan Aluminyum will revise the configuration of the new induction furnace at Dilovasi to ensure adequate protection of workers. The design of a molten metal transfer system for transporting liquid metal from induction furnace to melting furnaces will be reviewed.	a) Assan Aluminyum has prepared a corrective action plan and submitted it to IFC for review and approval. b) Assan Aluminyum has implemented the agreed action plan.	a) Corrective action plan: COD b) Implementation of corrective actions as per agreed time schedule.
8	Assan Aluminyum will ensure that safety of coil deposits at Tuzla, Dilovasi and Kartal plants is reviewed and adequate safety measures consistently implemented.	Assan Aluminyum has implemented the required measures in all coil deposits in Tuzla, Dilovasi, and Kartal.	COD.
9	Assan Aluminyum will develop a workplace monitoring plan in Tuzla, Dilovasi and Kartal.	Assan Aluminyum has developed the workplace monitoring plan. IFC has reviewed and accepted it.	December 2008.
10	Assan Aluminyum will review current practice for personal protective equipment (PPE) use and ensure enforcement, especially for hearing protection.	Assan Aluminyum has audited its staff on PPE use and enforced the use of hearing protection, as needed.	December 2008.
PS3: Pollution Prevention and Abatement			
11	The modernization and upgrade project will allow enhancing the air emission levels and meeting the IFC guidelines. Assan Aluminyum will develop and implement an air emission monitoring program to verify compliance with IFC guidelines. The monitoring approach will be made consistent for both plants.	a) Assan Aluminyum has developed the air emission monitoring program. IFC has reviewed and accepted it. b) Assan Aluminyum has regularly implemented air emission monitoring and verified compliance with IFC guidelines. Corrective actions have been identified, as needed.	a) December 2008. b) First monitoring conducted within three months after approval of the plan. Results submitted annually in the AMR.
12	Assan Aluminyum will install closed-loop water circuits with neutralizing and treatment systems to minimize water use and discharge at Dilovasi plant. Hot water hot spray no-detergent degreasing and cleaning section will be installed on the new tension leveller, which is expected to eliminate the need for use of chemical additives and therefore to cause zero discharge.	Assan Aluminyum has installed the equipment and provided an as-built report to IFC.	December 2010.

Assan Aluminyum (26648), Environmental and Social Action Plan – August 5, 2008

Item	Action	Completion Indicator	Timetable
13	Assan Aluminyum will review and revamp, as needed, the industrial and biological wastewater treatment scheme, to ensure that it meets applicable IFC guidelines. A disinfection unit will be added, as needed.	Assan Aluminyum has reviewed the scheme and revamped treatment units, as needed. Assan Aluminyum has provided an as-built report to IFC.	December 2009.
14	Assan Aluminyum will review the existing waste storage and sludge storage facilities at all plants, including Dilovasi, Tuzla and Kartal and will implement an upgrade program to ensure that they are adequately contained, covered and protected from third party entry.	Assan Aluminyum has implemented the upgrade program and has provided an as-built report to IFC.	December 2009.
15	Assan Aluminyum will assess eventual presence and implement safe removal / disposal, as needed, of internationally banned/regulated hazardous chemicals including asbestos, PCBs, and CFCs in its facilities undergoing dismantling / revamping and modernization operations.	Assan Aluminyum has implemented a survey of the eventual presence of the substances in its facilities and developed a corrective action plan as needed. IFC has reviewed and accepted it.	Three months after first disbursement.
16	Assan Aluminyum will annually quantify and report direct and indirect GHG emissions, in accordance with internationally recognized methodologies.	Assan Aluminyum has reported GHG emissions in its AMR to IFC.	According to AMR submittal schedule.
PS4: Community Health, Safety and Security			
17	Assan Aluminyum will include seismic safety criteria in the design and relevant responses considered in the emergency plans.	Assan Aluminyum has provided assurance about the use of seismic design criteria and adoption of relevant measures in the emergency action plans, including community safety.	COD.
18	Assan Aluminyum will review its relevant loading/unloading procedures and facilities, primarily in Dilovasi and Kartal, and implement best practices to ensure transport safety.	Assan Aluminyum has reviewed relevant procedures and facilities and developed an action plan, as needed. IFC has reviewed and accepted it.	Three months after first disbursement.